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Shomik Ghosh
250 Greenwich Street, 46th Floor
New York, NY 10007
Direct Dial: 203-285-4398
sghosh@spiroharrison.com

May 2, 2022

VIA ECF and EMAIL

Hon. Katherine Polk Failla
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2103
New York, New York 10007
Failla_NYSDChambers@nysd.uscourts.gov

Re: Geo-Group Communications, Inc. (“GCI”) v. Shah, et. al., No. 15 Civ. 1756 (KPF)

Dear Judge Failla:

We represent Defendant Vipin Shah in the above-captioned action.

On May 1, 2022, counsel for GCI informed Mr. Shah’s then-counsel that GCI intended to make an application to the Court regarding the settlement agreement entered into by the parties on July 1, 2021 (the “Agreement”). *See* Ex. A to Loree Letter, Dkt. No. 335-2. Counsel for GCI informed the Shahs that the Shahs would have until “close of business Monday” (*i.e.*, close of business Monday, May 2, 2022) to notify GCI if the Shahs consented to the unsealing of the Agreement. *Id.* As GCI’s counsel explained, if the Shahs did not respond by that time, GCI would “advise the Court accordingly.” *Id.* However, at 12:50PM on May 2, 2022, well before its own proposed “close of business” cutoff, GCI proceeded with the instant letter asking the Court to unseal the Agreement.

The Shahs do not oppose GCI’s request to unseal the Agreement and were planning on conveying as much to GCI by “close of business” today. However, because of GCI’s abrupt unilateral action, the Shahs submit this letter to confirm

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they too support the unsealing of the Agreement so the Court may help resolve the parties' remaining disputes.¹

Respectfully Submitted,



Shomik Ghosh

cc: All Counsel of Record via ECF

¹ The Shahs do not believe it appropriate to present argumentation about the underlying dispute to the Court before the Court first unseals the Agreement and formal briefing is ordered. However, the Shahs categorically deny the allegations made by GCI in its May 2, 2022 letter to the Court.